

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MONAE BLACK, MICHELLE  
GLASS and DALANDRA EVANS,

Plaintiffs,

v.

DELAWARE NORTH COMPANIES  
TRAVEL HOSPITALITY SERVICES,  
INC., and DELAWARE NORTH  
COMPANIES, INC.,

Defendants.

CIVIL ACTION NO.

1:16-cv-01410-TWT

JURY TRIAL DEMANDED

**CONSENT MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a)(2), having obtained Defendants' consent, Plaintiffs respectfully requests leave to file their Amended Complaint (attached hereto as Exhibit 1). *See id.* ("a party may amend its pleading only with the opposing party's written consent or the court's leave."). Plaintiffs seek leave to file their amended Complaint in order to add another Party as a Defendant. In their Initial Disclosures, Defendants identified DNCTHS Atlanta Partners as Plaintiffs' employer for purposes of Plaintiffs' allegations of unpaid overtime wages. Counsel for the parties have conferred, and counsel for the Defendants

has consented to, adding DNCTHS Atlanta Partners as a Defendant to this action.

Because Defendants consent to the filing of Plaintiffs' proposed amendment, Plaintiffs respectfully requests that the Court grant their motion and permit their Amended Complaint to be treated as properly filed. For the Court's convenience, a proposed order is attached as Exhibit 2.

Dated: July 27, 2016.

MAYS & KERR LLC  
235 Peachtree Street NE  
North Tower | Suite 202  
Atlanta, Georgia 30303  
Telephone: (404) 410-7998  
Facsimile: (404) 855-4066  
dustin@maysandkerr.com

s/Dustin L. Crawford  
Dustin L. Crawford  
Georgia Bar No. 758916

Counsel for Plaintiffs

Consented to by:

SEYFARTH SHAW LLP  
1075 Peachtree Street NE  
Suite 2500  
Atlanta, Ga 30309  
Telephone: (404)855-1500  
Facsimile: (404) 892-7056

s/Jeffrey L. Glaser  
Jeffrey L. Glaser  
Georgia Bar No. 296454

Counsel for Defendants